UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES LIABILITY INSURANCE CO., INC., AS INSURER OF ADMINASERVICE, INC.))))
Plaintiff,	<i>)</i>)
	CIVIL ACTION NO. 04-11824 PBS
v.)
)
ADVANTIUS, INC., NEAL)
BERGSTROM, ROBERT)
STEVENS, CHARLES CAMBRA,)
III, JONATHAN K. DRIGGS, AND)
WORKFORCE SOLUTIONS, INC.,)
Defendants.)))

MOTION FOR JUDGMENT BY DEFAULT AGAINST ADVANTIUS, INC.

Comes now, the plaintiff, United States Liability Insurance Co., Inc., as insurer of AdminaService, Inc. and hereby prays that this Court enter default against the defendant Advantius, Inc. pursuant to Fed.R.Civ.P. 55 (a) and 55(b)(1) for failure to plead or otherwise defend as required by Rules 12 and 14.

In support of this motion, the plaintiff states the following:

1. Advantius, Inc. was served individually on April 28, 2005 and its answer or response to the complaint was to be filed May 18, 2005. Advantius, Inc. has not filed an answer or other responsive pleading to date.

WHEREFORE, United States Liability Insurance Co., Inc., as insurer of AdminaService, Inc. respectfully requests that the Court enter an order granting judgment by default against

Advantius, Inc. plus interest, attorneys' fees, and costs, and any other relief this Court deems just and appropriate.

Respectfully Submitted,

UNITED STATES LIABILITY
INSURANCE CO., INC., AS
INSURER OF ADMINASERVICE, INC.,
By its attorneys,

/s/ Susan M. Morrison Susan M. Morrison BBO #553095 Fitzhugh, Parker & Alvaro, LLP 155 Federal Street Boston, MA 02110 tel: 617-695-2330

Dated: May 31, 2005